

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC.

Donald W. Clarke, Esq.

494 Broad Street

Newark, NJ 07102

Telephone: (973) 230-2095

Fax: (973) 533-1112

Email: DClarke@genovaburns.com

Counsel for Park Place Associates

In re:

WEWORK INC., *et al.*,

Debtors.

Chapter 11

Case No. 23-19865-JKS

(Jointly Administered)

**LIMITED OBJECTION BY PARK PLACE ASSOCIATES TO DEBTORS' MOTION FOR
ENTRY OF AN ORDER (I) AUTHORIZING AND APPROVING PROCEDURES TO REJECT
OR ASSUME EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND (II) GRANTING
RELATED RELIEF, JOINDER BY PARK PLACE ASSOCIATES TO ALL LANDLORD
OBJECTIONS, AND RESERVATION OF RIGHTS**

Park Place Associates ("Park Place"), by and through its undersigned counsel, respectfully submits this limited objection (the "Limited Objection") to the motion by WeWork, Inc. and affiliated debtors (collectively "WeWork" or the "Debtors") for entry of an Order (i) authorizing and approving procedures to reject or assume executory contracts and unexpired leases, and (ii) granting related relief, filed on November 7, 2023 (the "Motion"). [Doc 12] Furthermore, by this Limited Objection, Park Place Associates joins all landlord objections (to the extent applicable), reserves all rights, and respectfully represents as follows:

1. Park Place is a California general partnership and the landlord for the premises located at 3101 Park Boulevard, Palo Alto, California (the "Premises"). WeWork, through its affiliate and jointly administered debtor, 3101 Park Boulevard Tenant, LLC (jointly administered case no.: 23-20149) is a tenant of the Premises.

2. Park Place objects to several aspects of the relief sought in the Motion, particularly with respect to that relief inconsistent with the bankruptcy code and case law. Based upon communications with the Debtor, Park Place understands that some or all of the relief Park Place

deems objectionable will be resolved by a new proposed form of order to be circulated by the Debtor.

3. However, in the interest of preserving its rights, Park Place is filing this Limited Objection in an abundance of caution, and further reserves all rights with respect to this Limited Objection, including the right to amend and/or supplement this Limited Objection prior to or at any hearing related to the Motion, or based upon revised language in any anticipated proposed order.

GENOVA BURNS LLC.

Date: November 22, 2023

/s/ Donald W. Clarke
Donald W. Clarke, Esq.
494 Broad Street
Newark, NJ 07102
Telephone: (973) 230-2095
Fax: (973) 533-1112
Email: DClarke@genovaburns.com
Counsel for Park Place Associates